

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Sponsorship Identification Rules and)	MB Docket No. 08-90
Embedded Advertising)	
)	

To: The Commission

REPLY COMMENTS OF JOINT RADIO BROADCASTERS

Beasley Broadcast Group, Inc., Citadel Broadcasting Corporation, Entercom Communications Corp., Greater Media, Inc. and Journal Broadcast Corporation, (collectively, the “Joint Radio Broadcasters”), by their attorneys, hereby reply to comments filed in response to the Notice of Inquiry and Notice of Proposed Rule Making (“*NOI/NPRM*”) in the above captioned proceeding.¹ Joint Radio Broadcasters collectively own and operate 441 radio stations located in markets of all sizes throughout the United States, as described in Appendix A.

The *NOI/NPRM* and the responsive comments have focused primarily on the placement, and potential additional regulation of, “embedded advertising” during television programming.² In fact, the *NOI/NPRM* requests comment on only one issue

¹ *Sponsorship Identification Rules and Embedded Advertising*, Notice of Inquiry and Notice of Proposed Rule Making, 23 FCC Rcd 10682 (2008) (“*NOI/NPRM*”).

² The *NOI/NPRM* defines embedded advertising as “situations where sponsored brands are included in entertainment programming,” *id.* n.1, and attributes an “escalation” in such sponsorships “in part to recent technological changes that allow consumers to more readily bypass commercial content.” *Id.* (¶1). Joint Radio Broadcasters note that these technological changes (particularly, the advent of digital video recorders) are centered on television, and that there is no evidence that “[t]he use of embedded advertising is escalating,” *id.* (¶2), in the radio broadcast industry.

exclusive to radio programming - - “radio hosts’ personal, on-air endorsements of products or services that may have been provided at little or no cost to them,”³ and generally considers radio programming together with television programming in inquiring about the need for modifications to sponsorship identification rules.

In response to the *NOI/NPRM*, National Media Providers, a group of eighteen media companies including the Joint Radio Broadcasters, filed comments demonstrating that existing sponsorship identification requirements are fully adequate to address embedded advertising. The comments also described how changes to current requirements could undermine the careful balancing of interests developed over decades of practice.⁴ Comments filed by certain third-party organizations, however, request implementation of sweeping, intrusive regulations that would apply to all forms of product placements and endorsements. These commenters assert subjective and unsubstantiated opinions that embedded advertising is, for example, “deceptive and unfair,”⁵ yet present no evidence demonstrating that such practices are the cause of any specific or generalized harm. This lack of a cogent factual basis makes adoption of such proposals particularly unwarranted.⁶ As the comments of National Media Providers make clear, current Federal law is fully adequate to address the issues raised in the

³ *Id.* (¶18).

⁴ *See Comments of the National Media Providers*, MB Docket No. 08-90, filed Sept. 22, 2008 (“*Media Providers Comments*”).

⁵ *Comments of N.E. Marsden*, MB Docket No. 08-90, filed Sept. 22, 2008, at 25.

⁶ *See, e.g., Comments of Commercial Alert*, MB Docket No. 08-90, filed on Sept. 22, 2008, at II.C (admitting that “[w]e do not know how frequent are [certain embedded advertising] practices, nor other kinds of hidden advertisements on radio.”) (“*Commercial Alert Comments*”).

NOI/NPRM, including that of personal endorsements by radio hosts. The blanket of new regulations proposed by certain other commenters is unnecessary and unworkable.

Section 317 of the Communications Act specifically provides that “[a]ll matter . . . for which consideration is directly or indirectly paid . . . shall . . . be announced as paid for or furnished.”⁷ Section 317(d) permits the Commission to waive the requirement where it determines that the public interest does not warrant broadcasting an announcement, and Section 73.1212(f) of the Commission’s rules provides that a separate announcement is not required when the name of the sponsor or product is clear from the content of broadcast matter advertising commercial products or services.⁸ Congress amended Section 317 in 1960 to clarify situations for which sponsorship identification announcements are required, to ensure that the Commission did not interpret the statute too broadly. The Committee Report accompanying the legislation provided specific examples to illustrate the application of the sponsorship identification requirements in various scenarios.⁹ The Commission released a Public Notice shortly after the statute was amended which also articulated specific examples of the application of the requirements.¹⁰ Many of these “illustrative interpretations” are directly applicable to

⁷ 47 U.S.C. §317(a)(1).

⁸ 47 C.F.R. §73.1212(f) (“In the case of broadcast matter advertising commercial products or services, an announcement stating the sponsor’s corporate or trade name, or the name of the sponsor’s product, when it is clear that the mention of the name of the product constitutes a sponsorship identification, shall be deemed sufficient for the purpose of this section and only one such announcement need be made at any time during the course of the broadcast.”).

⁹ See H.R. Rep. No. 86-1800, *reprinted* in 1960 U.S.C.C.A.N. 3516, 3528-32.

¹⁰ *Applicability of Sponsorship Identification Rules, Revision of May 6, 1963 Public Notice, as Modified by April 21, 1975 Public Notice*, 40 Fed Reg. 41936 (Sept. 9, 1975) (“*Sponsorship Identification Public Notice*”).

product placements and endorsements in radio, and they “continue to provide sufficient guidance for the product placement concerns voiced in the NOI/NPRM.”¹¹ For example, under current law, if products are furnished to radio licensees or hosts for the purpose of engendering on-air mentions, Section 73.1212 applies, and if the identity of a sponsor is not clear from the content of the mentions, an announcement is required.¹²

Furthermore, rules of the Federal Trade Commission, which is charged with evaluating whether advertisements are false and deceptive,¹³ are directly on point. The FTC’s rules, like the FCC’s regulatory approach, recognize that in many endorsements, the identity of a sponsor is obvious and a separate announcement is not required.¹⁴ Specifically Section 255.5 of the FTC’s rules states: “An example of a connection that is ordinarily expected by viewers and need not be disclosed is the payment or promise of payment to an endorser who is an expert or well known personality, as long as the advertiser does not represent that the segment was given without compensation.”¹⁵

¹¹ *Media Providers Comments* at 20.

¹² *See Sponsorship Identification Public Notice* at 41938, Interpretation 8 (“An automobile dealer furnishes a station with a new car, not for broadcast use, in return for broadcaster mentions. An announcement is required.”); *id.*, Interpretation 9 (“A Cadillac is given to an announcer for his own use in return for a mention on the air of a product of the donor. An announcement is required.”).

¹³ The FTC has previously concluded that product placement practices described by some of the Commenters do not constitute unfair or deceptive acts or practices. *See* Letter from Mary K. Eagle, Associate Director for Advertising Practices, FTC, to Gary Ruskin (Feb. 10, 2005).

¹⁴ *See* 16 C.F.R. §255.5 (“When there exists a connection between the endorser and the seller of the advertised product which might materially affect the weight or credibility of the endorsement (*i.e., the connection is not reasonably expected by the audience*) such connection must be fully disclosed.”) (emphasis added).

¹⁵ *Id.*

Radio, of course, is an aural-only medium, meaning that product placement in radio requires clear statements about a product or service by an announcer or host, as compared to simply including the product as a background visual prop, as can occur in television. Product “endorsements,” due to the nature of the radio medium, typically involve repeated references to a specific product or service, adding to the obviousness that such mentions are paid for by the supplier of the product or service. When the obviousness exception does not apply, however, licensees are *already* required by the rules to make proper disclosures.¹⁶ Clearly, therefore, there is absolutely no need for the Commission to add another layer of regulation to the fully adequate existing rules by requiring any type of “presumption” about whether consideration is provided in exchange for on-air mentions of products and services by radio hosts.¹⁷

Commenters advocating additional regulation suggest modifications to sponsorship identification rules that would impose especially inequitable burdens on radio broadcasters. Specifically, some commenters suggest that “concurrent disclosure” of embedded advertisements should be required.¹⁸ However unworkable and intrusive this would be for programming with both audio and visual components, it would be particularly disruptive to the audio-only programming heard on radio.

One commenter at least acknowledges that requiring simultaneous disclosure for radio is not workable, but nonetheless recommends that disclosure “be as close to the

¹⁶ See 47 C.F.R. §73.1212; 16 C.F.R. §255.5.

¹⁷ See *NOI/NPRM* (¶18).

¹⁸ See, e.g., *Comments of Center for Media and Democracy*, MB Docket No. 08-90, filed on Sept. 22, 2008, at 6-7 (“*Media and Democracy Comments*”); *Commercial Alert Comments* at Section II.B.2.

television rule . . . as possible. There should be a disclosure immediately before the hidden announcement (within, say, 30 seconds), and it should state that an advertisement will follow or has just occurred.”¹⁹ Such a scheme completely ignores the reality that most radio programs and formats are fluid. Radio programming, to a greater extent than television programming, is aired live. It often is not planned, scripted or produced to an extent that makes the timing and placement of embedded advertisements predictable, or that would allow the advance “notice” necessary for broadcast of a mandated “warning” about the impending presence of sponsored material. Furthermore, there is no evidence in the record to suggest that listeners believe such a requirement is needed or desirable. In fact, it is considerably more likely that radio listeners would find such announcements to be distracting, annoying and demeaning.²⁰ Radio programming that is choppy, erratic, and interrupted by lengthy, standardized disclosures will also be unattractive to advertisers, including those who purchase advertising in the form of traditional spots during programming breaks. The Joint Radio Broadcasters encourage the Commission to remain cognizant of commercial radio broadcasters’ dependence on advertiser support, and to take no action, especially in these challenging economic times, that would make commercial radio a less attractive alternative for advertisers and the listeners who support them.

¹⁹ *Commercial Alert Comments* at Section II.C. Presumably, this means that a disclosure is to be made both “immediately before,” and then again after, broadcast of such material “has just occurred.”

²⁰ *See Media Providers Comments* at 28 (sponsorship identification announcements are “unlikely to be welcomed by a vast majority of the audience who would find such repeated interruptions highly intrusive on the programming they have selected to enjoy.”); *Comments of National Public Radio, Inc.*, MB Docket No. 08-90, filed Sept. 22, 2008, at 5 (“The interruption of programming to accommodate such announcements could produce substantial broadcast ‘clutter.’”).

Another commenter asserts that, in addition to “concurrent disclosure,” broadcasters should be required to compile, maintain, and list sponsors of embedded advertisements (or at least such ads that appear during news programming) on station websites and in public files.²¹ Such a requirement would be regulatory overkill. Requiring broadcasters to create formalized reports documenting instances of product placements and sponsorships would be a useless and burdensome administrative exercise in assembling information into a format completely devoid of connection to the context in which it initially appeared.

²¹ *Media and Democracy Comments* at 7.

Conclusion

Joint Radio Broadcasters urge the Commission to refrain from imposing burdensome, intrusive, unnecessary, redundant and legally suspect regulations addressing embedded advertising, and respectfully ask that in its deliberations of this issue, the Commission consider the particularized impact that adoption of any new rules will have on the commercial radio broadcasting industry.

Respectfully submitted,

Beasley Broadcast Group, Inc.
Citadel Broadcasting Corporation
Entercom Communications Corp.
Greater Media, Inc.
Journal Broadcast Corporation

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November 21, 2008

Their Attorneys

AM and FM Radio Stations Operated by the Joint Radio Broadcasters

Beasley Broadcast Group, Inc.

Beasley Broadcast Group, Inc. is the parent of the following:

WAEC License Limited Partnership,
licensee of:

WKXC-FM, Aiken, SC
WWWE(AM), Hapeville, GA
WRCA(AM), Waltham, MA
KBET(AM), Winchester, NV
WAEC(AM), Atlanta, GA
WGAC(AM), Augusta, GA
WHHD(FM), Clearwater, SC
WGUS-FM, New Ellenton, SC
WJBR-FM, Wilmington, DE

WCHZ License, LLC,
licensee of:

WCHZ-FM, Harlem, GA
WGUS(AM), Augusta, GA
WRDW(AM), Augusta, GA
WGAC-FM, Warrenton, GA

WGOR License, LLC,
licensee of:

WDRR(FM), Martinez, GA

WRXK License Limited Partnership,
licensee of:

WRXK-FM, Bonita Springs, FL

WXKB License Limited Partnership,
licensee of:

WXKB(FM), Cape Coral, FL

WJPT License Limited Partnership,
licensee of:

WJPT(FM), Fort Myers, FL
WWCN(AM), North Fort Myers, FL

WJBX License Limited Partnership,
licensee of:

WJBX(FM), Fort Myers Beach, FL

WMGV License Limited Partnership,
licensee of:

WMGV(FM), Newport, NC

WXNR License Limited Partnership,
licensee of:

WXNR(FM), Grifton, NC

WXTU License Limited Partnership,
licensee of:

WXTU(FM), Philadelphia, PA

WDAS License Limited Partnership,
licensee of:

WRDW-FM, Philadelphia, PA
WTEL(AM), Red Springs, NC
WZFX(FM), Whiteville, NC
WUKS(FM), St. Pauls, NC

**WKML License Limited Partnership,
licensee of:**

WKML(FM), Lumbarton, NC

**WFLB License Limited Partnership,
licensee of:**

WFLB(FM), Laurinburg, NC

**WKIS License Limited Partnership,
licensee of:**

WKIS(FM), Boca Raton, FL

**WSFL License Limited Partnership,
licensee of:**

WSFL(FM), New Bern, NC

**KJUL License LLC,
licensee of:**

KCYE(FM), N. Las Vegas, NV
KKLZ(FM), Las Vegas, NV
KFRH(FM), Boulder City, NV

**WPOW License Limited Partnership,
licensee of:**

WPOW(FM), Miami, FL

**WIKS License Limited Partnership,
licensee of:**

WIKS(FM), New Bern, NC

**WNCT License Limited Partnership,
licensee of:**

WNCT(AM), Greenville, NC
WNCT(FM), Greenville, NC

**WTMR License Limited Partnership,
licensee of:**

WTMR(AM), Camden, NJ

**WWDB License Limited Partnership,
licensee of:**

WWDB(AM), Philadelphia, PA

**WAZZ License Limited Partnership,
licensee of:**

WAZZ(AM), Fayetteville, NC

**WQAM License Limited Partnership,
licensee of:**

WQAM(AM), Miami, FL

**KDWN License Limited Partnership,
licensee of:**

KDWN(AM), Las Vegas, NV

Citadel Broadcasting Company

Citadel Broadcasting Company is the licensee of the following:

KAAY(AM), Little Rock, AR	KSMB(FM), Lafayette, LA
KARN(AM), Little Rock, AR	KSZR(FM), Oro Valley, AZ
KARN-FM, Sheridan, AR	KTBL(AM), Los Ranchos, NM
KATC-FM, Colorado Springs, CO	KTIC(AM), Nampa, ID
KATM(FM), Modesto, CA	KTUC(AM), Tucson, AZ
KATT-FM, Oklahoma City, OK	KUBL-FM, Salt Lake City, UT
KBEE(FM), Salt Lake City, UT	KURB(FM), Little Rock, AR
KBER(FM), Ogden, UT	KVOR(AM), Colorado Springs, CO
KBGG(AM), Des Moines, IA	KWIN(FM), Lodi, CA
KBOI(AM), Boise, ID	KWNN(FM), Turlock, CA
KBUL-FM, Carson City, NV	KWQW(FM), Boone, IA
KCSF(AM), Colorado Springs, CO	KWYL(FM), South Lake Tahoe, CA
KCUB(AM), Tucson, AZ	KXKC(FM), New Iberia, LA
KDJK(FM), Mariposa, CA	KYIS(FM), Oklahoma City, OK
KDRF(FM), Albuquerque, NM	KZMG(FM), New Plymouth, ID
KENZ(FM), Ogden, UT	WAAL(FM), Binghamton, NY
KESP(AM), Modesto, CA	WAPI(AM), Birmingham, AL
KFNZ(AM), Salt Lake City, UT	WAQX-FM, Manlius, NY
KGGO(FM), Des Moines, IA	WARM(AM), Scranton, PA
KHKL(FM), Des Moines, IA	WBBF(AM), Buffalo, NY
KHKK(FM), Modesto, CA	WBBL(AM), Grand Rapids, MI
KHOP(FM), Oakdale, CA	WBEI(FM), Reform, AL
KHTB(FM), Provo, UT	WBHD(FM), Olyphant, PA
KHYT(FM), Tucson, AZ	WBHT(FM), Mountain Top, PA
KIIM-FM, Tucson, AZ	WBLM(FM), Portland, ME
KIPR(FM), Pine Bluff, AR	WBPW(FM), Presque Isle, ME
KIZN(FM), Boise, ID	WBSM(AM), New Bedford, MA
KJJY(FM), West Des Moines, IA	WBSX(FM), Hazleton, PA
KJOY(FM), Stockton, CA	WCAT-FM, Carlisle, PA
KJQS(AM), Murray, UT	WCDV(FM), Hammond, LA
KKAT(AM), Salt Lake City, UT	WCTO(FM), Easton, PA
KKFM(FM), Colorado Springs, CO	WCYY(FM), Biddeford, ME
KKGL(FM), Nampa, ID	WDGM(FM), Greensboro, AL
KKMG(FM), Pueblo, CO	WDVW(FM), La Place, LA
KKND(FM), Port Sulphur, LA	WEAN-FM, Wakefield-Peacedale, RI
KKOB(AM), Albuquerque, NM	WEBB(FM), Waterville, ME
KKOB-FM, Albuquerque, NM	WEDG(FM), Buffalo, NY
KKOH(AM), Reno, NV	WEFG-FM, Whitehall, MI
KKPK(FM), Colorado Springs, CO	WEMX(FM), Kentwood, LA
KLAL(FM), Wrightsville, AR	WFBE(FM), Flint, MI
KMEZ(FM), Belle Chasse, LA	WFFN(FM), Coaling, AL
KMGA(FM), Albuquerque, NM	WFHN(FM), Fairhaven, MA
KNEK(AM), Washington, LA	WFMK(FM), East Lansing, MI
KNEK-FM, Washington, LA	WGFY(FM), Gallatin, TN
KNEV(FM), Reno, NV	WGKX(FM), Memphis, TN
KNML(AM), Albuquerque, NM	WGOC(AM), Kingsport, TN
KPZK(AM), Little Rock, AR	WGOW(AM), Chattanooga, TN
KQFC(FM), Boise, ID	WGOW-FM, Soddy-Daisy, TN
KQXL-FM, New Roads, LA	WGRF(FM), Buffalo, NY
KRRQ(FM), Lafayette, LA	WHLD(AM), Niagara Falls, NY
KRST(FM), Albuquerque, NM	WHNN(FM), Bay City, MI

WHOM(FM), Mt. Washington, NH
WHTS(FM), Hart, MI
WHTT-FM, Buffalo, NY
WHWK(FM), Binghamton, NY
WIBR(AM), Baton Rouge, LA
WILZ(FM), Saginaw, MI
WIOG(FM), Bay City, MI
WIOV(AM), Reading, PA
WIOV-FM, Ephrata, PA
WISW(AM), Columbia, SC
WITL-FM, Lansing, MI
WIVK-FM, Knoxville, TN
WIWF(FM), Charleston, SC
WJBQ(FM), Portland, ME
WJCW(AM), Johnson City, TN
WJIM(AM), Lansing, MI
WJIM-FM, Lansing, MI
WJOX(FM), Birmingham, AL
WJZN(AM), Augusta, ME
WKDF(FM), Nashville, TN
WKIM, Munford, TN
WKLQ(FM), Greenville, MI
WKOS(FM), Kingsport, TN
WKQZ(FM), Midland, MI
WKY(AM), Oklahoma City, OK
WLAV-FM, Grand Rapids, MI
WLAW(FM), Newaygo, MI
WLCS(FM), North Muskegon, MI
WLEV(FM), Allentown, PA
WLTi(FM), Syracuse, NY
WLXC(FM), Lexington, SC
WMAS(AM), Springfield, MA
WMAS-FM, Springfield, MA
WMDH(AM), New Castle, IN
WMDH-FM, New Castle, IN
WMGS(FM), Wilkes-Barre, PA
WMHX(FM), Hershey, PA
WMME-FM, Augusta, ME
WMMQ(FM), East Lansing, MI
WMOS(FM), Montauk, NY
WMTI(FM), Picayune, MS
WNB(AM), Binghamton, NY
WNKT(FM), St. George, SC
WNML(AM), Knoxville, TN
WNML-FM, Loudon, TN
WNRX(FM), Jefferson City, TN
WNSS(AM), Syracuse, NY
WNTQ(FM), Syracuse, NY
WODJ(AM), Whitehall, MI
WOGT(FM), East Ridge, TN
WOKI-FM, Oliver Springs, TN

WOKQ(FM), Dover, NH
WOMG(FM), Columbia, SC
WORC-FM, Webster, MA
WOZI(FM), Presque Isle, ME
WPKQ(FM), North Conway, NH
WPRO(AM), Providence, RI
WPRO-FM, Providence, RI
WPRV(AM), Providence, RI
WQGN-FM, Groton, CT
WQHR(FM), Presque Isle, ME
WQHZ(FM), Erie, PA
WQUT(FM), Johnson City, TN
WQXA-FM, York, PA
WRBO(FM), Como, MS
WRIE(AM), Erie, PA
WSAK(FM), Hampton, NH
WSHK(FM), Kittery, ME
WSJR(FM), Dallas, PA
WSKZ(FM), Chattanooga, TN
WSPZ(AM), Birmingham, AL
WSSX-FM, Charleston, SC
WSUB(AM), Groton, CT
WTCB(FM), Orangeburg, SC
WTMA(AM), Charleston, SC
WTNR(FM), Holland, MI
WTRX(AM), Flint, MI
WTSK(AM), Tuscaloosa, AL
WTUG-FM, Tuscaloosa, AL
WTVL(AM), Waterville, ME
WUHT(FM), Birmingham, AL
WVFN(AM), Lansing, MI
WVIB(FM), Holton, MI
WWFX(FM), Southbridge, MA
WWKI(FM), Kokomo, IN
WWKX(FM), Woonsocket, RI
WWLI(FM), Providence, RI
WWLS(AM), Moore, OK
WWLS-FM, Edmund, OK
WWMM(FM), Helena, AL
WWWZ(FM), Summerville, SC
WWYL(FM), Chenango Bridge, NY
WXKC(FM), Erie, PA
WXML(FM), Stonington, CT
WXLO(FM), Fitchburg, MA
WXXM(FM), Millington, TN
WXOK(AM), Baton Rouge, LA
WXSM(AM), Blountville, TN
WXTA(FM), Edinboro, PA
WYOS(AM), Binghamton, NY
WZRR(FM), Birmingham, AL

Citadel Broadcasting Corporation is the parent of the following:

Radio License Holding I, LLC,
licensee of:

WJR(AM), Detroit, MI
WDVD(FM), Detroit, MI
WDRQ(FM), Detroit, MI

Radio License Holding II, LLC,
licensee of:

WYAY(FM), Gainesville, GA
WKHX-FM, Marietta, GA

Radio License Holding III, LLC,
licensee of:

KQRS-FM, Golden Valley, MN
KXXR(FM), Minneapolis, MN
WGVX(FM), Lakeville, MN
WGVY(FM), Cambridge, MN
WGVZ(FM), Eden Prairie, MN

Radio License Holding IV, LLC,
licensee of:

WBAP(AM), Fort Worth, TX
KSCS(FM), Fort Worth, TX
KPMZ(FM), Flower Mound, TX

Radio License Holding V, LLC,
licensee of:

WLS-FM, Chicago, IL

Radio License Holding VI, LLC,
licensee of:

KABC(AM), Los Angeles, CA

Radio License Holding VII, LLC,
licensee of:

WMAL(AM), Washington, DC
WRQX(FM), Washington, DC
WJZW(FM), Woodbridge, VA

Radio License Holding VIII, LLC,
licensee of:

KGO(AM), San Francisco, CA
KSFO(AM), San Francisco, CA

Radio License Holding IX, LLC,
licensee of:

WPLJ(FM), New York, NY

Radio License Holding X, LLC,
licensee of:

WABC(AM), New York, NY

Radio License Holding XI, LLC,
licensee of:

WLS(AM), Chicago, IL

Radio License Holding XII, LLC,
licensee of:

KLOS(FM), Los Angeles, CA

Entercom Communications Corp.

Entercom Communications Corp. is the parent of the following:

Entercom Austin License, LLC, **licensee of:**

KAMX(FM), Luling, TX
KJCE(AM), Rollingwood, TX
KKMJ-FM, Austin, TX

Entercom Boston License, L.L.C., **licensee of:**

WEEI(AM), Boston, MA
WRKO(AM), Boston, MA
WVEI(AM), Worcester, MA
WMKK(FM), Lawrence, MA
WAAF(FM), Westborough, MA
WKAF(FM), Brockton, MA

Entercom Buffalo License, LLC, **licensee of:**

WBEN(AM), Buffalo, NY
WTSS(FM), Buffalo, NY
WWKB(AM), Buffalo, NY
WKSE(FM), Niagara Falls, NY
WGR(AM), Buffalo, NY
WWWS(AM), Buffalo, NY
WLKK(FM), Wethersfield Township, NY

Entercom Denver License, LLC, **licensee of:**

KALC(FM), Denver, CO
KQMT(FM), Denver, CO
KOSI(FM), Denver, CO
KEZW(AM), Aurora, CO

Entercom Gainesville License, LLC, **licensee of:**

WTKT(FM), Crystal River, FL
WSKY-FM, Micanopy, FL

Entercom Greensboro License, LLC, **licensee of:**

WPAW(FM), Winston-Salem, NC
WJMH(FM), Reidsville, NC
WEAL(AM), Greensboro, NC
WQMG-FM, Greensboro, NC
WPET(AM), Greensboro, NC
WSMW(FM), Greensboro, NC

Entercom Greenville License, LLC, **licensee of:**

WFBC-FM, Greenville, SC
WSPA-FM, Spartanburg, SC
WYRD(AM), Greenville, SC
WORD(AM), Spartanburg, SC
WYRD-FM, Simpsonville, SC
WROQ(FM), Anderson, SC
WTPT(FM), Forest City, NC

Entercom Indianapolis License, LLC, **licensee of:**

WZPL(FM), Greenfield, IN
WNTR(FM), Indianapolis, IN
WXNT(AM), Indianapolis, IN

Entercom Kansas City License, LLC, **licensee of:**

KMBZ(AM), Kansas City, MO
KBLV(FM) Kansas City, MO
KCSP(AM), Kansas City, MO
KUDL(FM), Kansas City, KS
KQRC-FM, Leavenworth, KS
WDAF-FM, Liberty, MO
KRBZ(FM), Kansas City, MO
KYYs(AM), Kansas City, KS
KXTR(AM), Kansas City, KS
(AM Expanded Band)

Entercom Madison License, LLC,
licensee of:

WOLX-FM, Baraboo, WI
WCHY(FM), Waunakee, WI
WMMM-FM, Verona, WI

Entercom Memphis License, LLC,
licensee of:

WMC(AM), Memphis, TN
WMC-FM, Memphis, TN
WMFS(FM), Bartlett, TN
WKQK(FM), Germantown, TN
WSMB(AM), Memphis, TN
WRVR(FM), Memphis, TN

Entercom Milwaukee License, LLC,
licensee of:

WSSP(AM), Milwaukee, WI
WMYX-FM, Milwaukee, WI
WXSS(FM), Wauwatosa, WI

Entercom New Orleans License, LLC,
licensee of:

WWWL(AM), New Orleans, LA
WWL(AM), New Orleans, LA
WEZB(FM), New Orleans, LA
WLMG(FM), New Orleans, LA
WWL-FM, Kenner, LA
WKBU(FM), New Orleans, LA

Entercom Norfolk License, LLC,
licensee of:

WPTE(FM), Virginia Beach, VA
WWDE-FM, Hampton, VA
WVKL(FM), Norfolk, VA
WNVZ(FM), Norfolk, VA

Entercom Portland License, LLC,
licensee of:

KGON(FM), Portland, OR
KNRK(FM), Camas, WA
KTRO(AM), Vancouver, WA
KYCH-FM, Portland, OR
KRSK(FM), Molalla, OR
KKSJ(AM), Salem, OR
KWJJ-FM, Portland, OR
KFXX(AM), Portland, OR

Entercom Providence License, LLC,
licensee of:

WEEI-FM, Westerly, RI

Entercom Rochester License, LLC,
licensee of:

WROC(AM), Rochester, NY
WBEE-FM, Rochester, NY
WBZA(FM), Rochester, NY
WCMF-FM, Rochester, NY
WPXY-FM, Rochester, NY

Entercom Sacramento License, LLC,
licensee of:

KDND(FM), Sacramento, CA
KSEG(FM), Sacramento, CA
KRXQ(FM), Sacramento, CA
KCTC(AM), Sacramento, CA
KSSJ(FM), Fair Oaks, CA
KWOD(FM), Sacramento, CA

Entercom San Francisco License, LLC,
licensee of:

KDFC-FM, San Francisco, CA
KOIT-FM, San Francisco, CA
KBWF(FM), San Francisco, CA

Entercom Seattle License, LLC,
licensee of:

KMTT(FM), Tacoma, WA
KNDD(FM), Seattle, WA
KISW(FM), Seattle, WA
KKWF(FM), Seattle, WA

Entercom Springfield License, LLC,
licensee of:

WVEI-FM, Easthampton, MA

Entercom Wichita License, LLC,
licensee of:

KEYN-FM, Wichita, KS
KFH(AM), Wichita, KS
KNSS(AM), Wichita, KS
KFBZ(FM), Haysville, KS
KFH-FM, Clearwater, KS
KDGS(FM), Andover, KS

Entercom Wilkes-Barre Scranton, LLC,
licensee of:

WBZU(AM), Scranton, PA
WGGI(FM), Benton, PA
WKRZ(FM), Freeland, PA
WILK-FM, Avoca, PA
WKZN(AM), West Hazleton, PA
WDMT(FM), Pittston, PA
WILK(AM), Wilkes-Barre, PA
WGGY(FM), Scranton, PA
WKRF(FM), Tobyhanna, PA

Greater Media, Inc.

Greater Media, Inc. is the parent of the following:

Charles River Broadcasting Company, licensee of:

WKLB-FM, Waltham, MA

Greater Boston Radio, Inc., licensee of:

WROR-FM, Framingham, MA
WBOS(FM), Brookline, MA
WMJX(FM), Boston, MA
WTKK(FM), Boston, MA
WMMR(FM), Philadelphia, PA
WCSX(FM), Birmingham, MI
WRIF(FM), Detroit, MI
WMGC-FM, Detroit, MI

Greater Philadelphia Radio, Inc., licensee of:

WBEN-FM, Philadelphia, PA
WMGK(FM), Philadelphia, PA
WNUW(FM), Burlington, NJ
WPEN(AM), Philadelphia, PA

Jersey Shore Broadcasting Corporation, licensee of:

WJRZ(FM), Manahawkin, NJ

The Sentinel Publishing Co., licensee of:

WCTC(AM), New Brunswick, NJ
WMTR(AM), Morristown, NJ
WWTR(AM), Bridgewater, NJ
WRAT(FM), Point Pleasant, NJ
WMGQ(FM), New Brunswick, NJ
WDHA-FM, Dover, NJ

Greater Media Charlotte, Inc., licensee of:

WLNK(FM), Charlotte, NC
WBT(AM), Charlotte, NC
WBT-FM, Chester, SC

Journal Broadcast Corporation

Journal Broadcast Corporation is the licensee of the following:

KCID(AM), Caldwell, ID
KFAQ(AM), Tulsa, OK
KFFN(AM), Tucson, AZ
KFTI(AM), Wichita, KS
KGEM(AM), Boise, ID
KSGF(AM), Springfield, MO
KXSP(AM), Omaha, NE
WKTI(AM), Powell, TN
WTMJ(AM), Milwaukee, WI
KJOT(FM), Boise, ID
KQXR(FM), Payette, ID
KRVB(FM), Nampa, ID
KTHI(FM), Caldwell, ID
WKHT(FM), Knoxville, TN
WMYU(FM), Karns, TN
WWST(FM), Sevierville, TN
WLWK-FM, Milwaukee, WI
KEZO-FM, Omaha, NE

KKCD(FM), Omaha, NE
KQCH(FM), Omaha, NE
KSRZ(FM), Omaha, NE
KSGF-FM, Ash Grove, MO
KSPW(FM), Sparta, MO
KTTS-FM, Springfield, MO
KZRQ-FM, Mount Vernon, MO
KGMG(FM), Oracle, AZ
KMXZ-FM, Tucson, AZ
KQTH(FM), Tucson, AZ
KXBL(FM), Henryetta, OK
KVOO-FM, Tulsa, OK
KFDI-FM, Wichita, KS
KFTI-FM, Newton, KS
KFXJ(FM), Augusta, KS
KICT-FM, Wichita, KS
KYQQ(FM), Arkansas City, KS